COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. NO. 01-20

RECORD REQUEST: Department of Telecommunications and Energy to AT&T Communications of New England, Inc.

DATE: January 24, 2002

RR-DTE 46 Please provide copies of invoices for the material and installation costs of backup generators.

Respondent: S. Turner

RESPONSE: AT&T is not contesting Verizon's backup generator costs. Mr. Turner used Verizon's investment values for standby generators. *See* Tr. 1/24/02 at 1499-1500.

AT&T's material and installation costs of backup generators are provided on the attached invoices. Note that the generators in these invoices are larger than AT&T normally recommends for central office applications. The difference in size is explainable by the difference between the Verizon and CLEC network architecture. The average Verizon central office has approximately 16,000 lines, per the Massachusetts Section 271 order. Verizon has approximately 270 central offices in Massachusetts. In contrast, CLECs have far fewer locations, simply for efficiency reasons, and thus the CLEC locations are larger than Verizon's central offices and therefore require larger standby generators.

<u>Worcester, MA</u>
An invoice does not exist for the DC power job done in Worcester, Massachusetts, because that job did not involve the installation of a standby generator. The standby power to the installation was supplied by growth capacity on the existing 2500 kW diesel generator. The current load on this generator is approximately 750 kW. This generator is backed up by DC batteries and the standby arrangement to dispatch a truck mounted replacement generator to the site in the event the generator fails.

Washington, D.C. (1997)

See attachment A, Delaware data response, BA-ATT 1-46S, for purchase orders for the installation of a 500 kW standby generator in Washington, D.C., at 1331 F. Street North West. This attachment contains proprietary information and is being provided only to the Department and parties which have signed a confidentiality agreement with AT&T.

Baltimore, MD (1995)

See attachment A, Delaware data response, BA-ATT 1-46S, for a purchase order for the installation of a 500 kW diesel standby generator in Baltimore, Maryland, at 25 South Charles Street. This attachment contains proprietary information and is being provided only to the Department and parties which have signed a confidentiality agreement with AT&T.

Washington, D.C. (1998)

See attachment B, Delaware data response, BA-ATT 1-46SS, for a purchase order and AT&T Project Bid Prices for the installation of twin 1500 kW standby generators in Washington, D.C., at 725 13th Street North West. As the Project Bid Price indicates, the installation of these two generators was particularly complex and costly, in part because of the synchronization of the twin generators. This attachment contains proprietary information and is being provided only to the Department and parties which have signed a confidentiality agreement with AT&T.

Oakton, VA (1998)

Attachment C includes invoices for the installation of 625 kW standby generator in Oakton, Virginia. This attachment contains proprietary information and is being provided only to the Department and parties which have signed a confidentiality agreement with AT&T.